

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

2024 NOV -4 PM 12:53

Jay Connor,

Plaintiff,

Vs.

David Wishnia and John Does 1-10

Defendants.

C/A No: 2:24-cv-6310-JD-MGB

**ANSWERS OF THE PLAINTIFF TO
STANDARD INTERROGATORIES
PURSUANT TO LOCAL RULE 26.01
DSC**

Plaintiff Jay Connor, pursuant to Local Civil Rule 26.01 DSC, respectfully submits the following answers to the Court's standard interrogatories under Local Civil Rule 26.01 DSC.

- (A) State the name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

ANSWER: Plaintiff is not aware of any persons or legal entities who have a subrogation interest in the claims.

- (B) As to each claim, state whether it should be tried jury or non-jury and why.**

ANSWER: In his Complaint, Plaintiff has requested a jury trial on all his claims. Plaintiff believes that issues of fact affect each of his claims in this case and are appropriate for jury resolution.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten**

percent or more of the outstanding shares.

ANSWER: Plaintiff is an individual, not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The basis for asserting the claim in the division in which it was filed is the Plaintiff received the alleged calls in Charleston, SC, therefore a substantial part of the events giving rise to the claims occurred in this division. The alleged calls made by or on behalf of Defendants to Plaintiff's number also establish that the Defendants conduct and transact business in Charleston, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Court of court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judge?

ANSWER: Plaintiff is not aware that this action is related in whole or in part to any other matter filed in this District.

(F) [Defendants only] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: N/A


(G) [Defendants only] If you contend that some other person or legal entity is in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: N/A

(H) *Parties or Intervenorors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER: This court has federal-question subject matter jurisdiction over Plaintiff's TCPA claims pursuant to 28 U.S.C. § 1331 because the TCPA is a federal statute.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jay Connor", is written over a horizontal line.

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November 4, 2024